

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

YOGEV SHAT, on behalf of himself and all others similarly situated,

Plaintiffs,

V.

SUPREME GARAGE DOOR, LLC and
RON DAHARI

Defendants.

Case No. 3:24-cv-02202

**DEFENDANTS' SECOND AGREED MOTION TO EXTEND
THE DEADLINE TO ANSWER OR RESPOND TO PLAINTIFFS'
ORIGINAL VERIFIED COLLECTIVE ACTION OR,
ALTERNATIVELY, CLASS ACTION COMPLAINT**

Defendants Supreme Garage Door, LLC and Ron Dahari (together, the “Defendants”) hereby file this Second Agreed Motion to Extend the Deadline to Answer or Respond to Plaintiffs’ Original Verified Complaint Collective Action or, Alternatively, Class Action Complaint (the “Motion”), and would show the Court as follows:

1. Plaintiffs Yogev Shat, on behalf of himself and all other similarly situated (together, “Plaintiffs”) filed their Original Verified Complaint Collective Action or, Alternatively, Class Action Complaint (the “Complaint”) on August 27, 2024, in which they have pled four claims against Defendants for: (i) violation of the Fair Labor Standards Act (“FLSA”); (ii) alternatively, declaratory judgment; (iii) alternatively breach of contract; and (iv) negligence.
2. The Complaint was served on Defendants on August 28, 2024.
3. Defendants’ deadline to serve and answer or response to the Complaint was originally September 18, 2024.

4. Defendants formally retained the undersigned as their legal counsel in this matter on September 12, 2024.

5. On September 13, 2024, Defendants filed an unopposed motion to extend the answer deadline to the Complaint to October 18, 2024, which this Court granted.

6. Since that time, the parties have actively engaged in substantive discussions aimed at achieving an early settlement. Those discussions are ongoing, and Defendants thus now respectfully request that the Court grant Defendants a second extension of time to answer or respond to the Complaint. Specifically, Defendants ask this Court to extend that date by an additional 21 days, to November 8, 2024.

7. Plaintiffs do not oppose this motion, and agree that an additional extension of time for Defendants to answer or respond to the Complaint is warranted to permit the parties to continue to engage in meaningful discussions aimed at settling their dispute before further litigation is necessary.

8. This Motion is filed in good faith, is not intended for purposes of delay, and will not cause any prejudice.

9. For the reasons set forth above, Defendants respectfully request that the Court grant this Motion, extend the Defendants' deadline to answer or otherwise respond to the Complaint up to and including November 8, 2024, and grant any and all other relief, at law or in equity, to which the parties have shown themselves justly entitled.

Dated: October 14, 2024.

Respectfully submitted,

/s/Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.

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**ATTORNEYS DEFENDANTS SUPREME
GARAGE DOOR, LLC and RON DAHARI**

CERTIFICATE OF SERVICE

I hereby certify that all current counsel of record have been served with a copy of the foregoing document via the Court's CM/ECF system in accordance with Local Civil Rule 5.1 on this 14th day of October, 2024.

/s/ Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.

CERTIFICATE OF CONFERENCE

I hereby certify that I personally conferred with Plaintiffs' counsel Michael Steinmark regarding the substance of this motion, and he indicated that Plaintiffs are unopposed, and agree, to the relief requested.

/s/ Kenneth N. Hickox, Jr.

Kenneth N. Hickox, Jr.